

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

TIG INSURANCE COMPANY,  
as successor-in-interest to  
TRANSAMERICA INSURANCE COMPANY,

Petitioner,

-against-

FIRST STATE INSURANCE COMPANY,

Respondent.

**CIVIL ACTION NO.  
04CV12729MLW**

**AFFIDAVIT OF JOHN F. FINNEGAN**

I, John F. Finnegan, being duly sworn, do hereby certify, depose and state as follows:

1. I am a partner in the New York law firm of Cadwalader, Wickersham & Taft LLP, 100 Maiden Lane, New York, New York 10038. I make this affidavit upon my personal knowledge and in support of my application to appear in this proceeding as an attorney *pro hac vice*.

2. I am a member in good standing of the Bars of the State of New York and the United States District Courts for the Southern and Eastern Districts of New York. I have no grievance or disciplinary proceedings pending against me, and I have never been disbarred, suspended or disciplined.

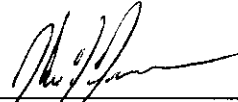
3. I am neither licensed to practice law in the Commonwealth of Massachusetts nor a resident of the Commonwealth of Massachusetts. I have familiarized myself with the Local Rules of the United States District Court for the District of Massachusetts.

4. The petitioner desires that Cadwalader represent it in this litigation due to Cadwalader's familiarity with the petitioner and the matters involved in this proceeding.

5. The law firm of Cetrulo & Capone LLP, Boston, Massachusetts, will be actively associated with Cadwalader in this litigation and will serve as co-counsel of record.

For the foregoing reasons, I respectfully request that the Court permit me to take part in this litigation and that the Motion to Admit Counsel *pro hac vice* be granted.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 10th DAY OF JANUARY, 2005.



John F. Finnegan  
Cadwalader, Wickersham & Taft LLP  
100 Maiden Lane  
New York, NY 10038  
(212) 504-6000

State of New York                    )  
  ) ss.  
County of New York                )

On this 10<sup>th</sup> day of January, 2005, before me personally appeared John F. Finnegan, executing the above instrument, and acknowledged said instrument to be his free and voluntary act and deed.



Notary Public  
Commission Expires: 2/28/06

NEIL A. ELLMAN  
Notary Public, State of New York  
No. 41-406107  
Qualified in Queens County  
Certificate filed in New York County  
Commission Expires 2/28/06

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FIRST STATE INSURANCE COMPANY,

Respondent.

**CIVIL ACTION NO.  
04CV12729MLW**

**AFFIDAVIT OF MICHAEL K. ROBLES**

I, Michael K. Robles, being duly sworn, do hereby certify, depose and state as follows:

1. I am an associate with the firm Cadwalader, Wickersham & Taft LLP, 100 Maiden Lane, New York, New York 10038. I make this affidavit upon my personal knowledge and in support of my application to appear in this proceeding as an attorney *pro hac vice*.

2. I am a member in good standing of the Bars of the State of New York and the United States District Court for the Southern District of New York. I have no grievance pending against me, and I have never been disbarred, suspended or disciplined.

3. I am neither licensed to practice law in the Commonwealth of Massachusetts nor a resident of the District of Massachusetts. I have familiarized myself with the Local Rules of the United States District Court for the District of Massachusetts.

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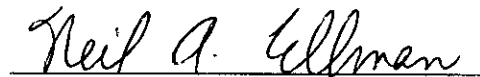
SIGNED UNDER THE PENALTIES OF PERJURY THIS 10th DAY OF JANUARY, 2005.



Michael K. Robles  
Cadwalader, Wickersham & Taft LLP  
100 Maiden Lane  
New York, NY 10038  
(212) 504-6000

State of New York                     )  
  ) ss.  
County of New York                 )

On this 10<sup>th</sup> day of January, 2005, before me personally appeared Michael K. Robles, executing the above instrument, and acknowledged said instrument to be his free and voluntary act and deed.



Notary Public  
Commission Expires: 2/28/06

NEIL A. ELLMAN  
Notary Public, State of New York  
No. 014591078  
Qualified in Queens County  
Certificate filed in New York County  
Commission Expires 2/28/06